REMARKS

<u>Interview Summary</u>

Applicants appreciate the Examiner's time and consideration during an interview held May 15, 2009. During the interview, Applicants' Representatives and Examiner Phung discussed independent claim 1 and the teachings of the prior art, U.S. Patent No. 6,002,689 (Christie). Applicants' Representatives presented arguments as to why Christie does not teach or suggest the limitations of claim 1. The Examiner continued to disagree with the Applicants' arguments. The Examiner indicated that he would accept and consider a supplementary amendment if received by May 21, 2009. Applicants have made additional amendments and arguments to further define and clarify the present invention, as described below in greater detail.

<u>Response</u>

Upon entry of this Amendments, claims 1 and 3-14 are pending. Claims 1 and 11 are amended and claim 2 has been canceled, leaving claims 2, 3-10, and 12-14 unchanged.

The Examiner rejected claims 1, 3, 4, and 11 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,002,689 (Christie).

Christie does not teach or suggest each and every limitation of claim 1. Rather, Christie discloses a system and method for interfacing a <u>local</u> communication device with an ATM network. As illustrated in Fig. 2, a local communication device 208 is connected to an ATM communication device through a signaling processor 202, an application 108, and an interworking unit 204. The local communication device 208 sends a message in TDM format 118 to the interworking unit 204. The interworking unit 204 sends the message to the application 108 for call processing and protocol conversion. Then, the application 108 sends the converted message back to the interworking unit 204. The interworking unit 204 performs a format conversion from TDM format to ATM format and forwards the message to the ATM communication device 210. *See column 12 lines 6-52.* Thus, Fig. 2 of Christie discloses interworking between two <u>devices</u> in <u>one local network</u>. For the sake of argument, even if the local communication device 208 and the ATM communication device 210 are each a network, then Christie still does not teach or suggest interworking between two <u>heterogeneous</u> broadband networks. A network consisting of one device is a <u>homogeneous</u> network.

Fig. 3 of Christie "is a block diagram of an interface system for communicating with applications between local communication devices and high speed asynchronous transfer mode devices in a local services architecture" (emphasis added). *See column 6, lines 38-41.* Thus, Fig. 3 of Christie discloses interworking between different communication devices in one local services architecture (LSA). Christie states that "the interworking unit 204 interworks between ATM traffic and non-ATM traffic." *See column 14, lines 33-34.* Although interworking is performed within a local system, the interworking is between a communication device and an ATM device. As illustrated in Fig. 3, all messages (i.e., solid lines) pass through an interworking unit 204 or 306 and an ATM cross connect 316. Each interworking unit 204 and 306 performs interworking between a communication device 302 or 304 and an ATM device (i.e., ATM cross connect 316).

For argument's sake, even if the communication devices are different networks 302 and 304, the limitations of claim 1 are still not met. Claim 1 requires, among other things:

> "if the call request is a call between the heterogeneous networks, creating a connection between the media interworking equipment and the caller party equipment and a connection between the media interworking equipment and a called party equipment in the other heterogeneous network under the control of the call control equipment, wherein creating the connections comprises creating a media port within the caller party equipment; creating a media port within the called party equipment; creating, within the media interworking equipment and based on a command from the call control equipment, a first internal media port that corresponds to the caller party equipment and a second internal media port that corresponds to the called party equipment and establishing a mapping between the first and second internal media ports; and transmitting media streaming by the media interworking equipment based on the mapping between the first and second media ports to realize media interworking" (emphasis added).

The media interworking units 204 or 306 of Christie create one port for the communication device 302 or 304, respectively, and one port for the ATM cross connect 316. Never does one interworking unit of Christie create one port for one communication device and a second port for the other communication device. The interworking units disclosed by Christie always convert the protocol of the communication device to the ATM protocol.

In light of the foregoing, Christie does not teach or suggest each and every limitation of claim 1. As such, claim 1 is allowable. In addition, claims 3-10 depend from claim 1 and are allowable over Christie for these and other reasons.

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Christie does not teach or suggest each and every limitation of claim 11. As discussed with respect to claim 1, Christie does not disclose interworking between two broadband heterogeneous networks. Rather, Christie discloses interworking between communication devices and an ATM network. The ATM network is a homogeneous network because all communications in the ATM network are ATM communications.

Furthermore, Christie does not teach or suggest "wherein the media interworking equipment implements teleservice interworking between the heterogeneous networks by establishing a first internal media port within the media interworking equipment that corresponds to a caller party equipment in one heterogeneous network and a second internal media port within the media interworking equipment that corresponds to a called party equipment in the other heterogeneous network" (emphasis added).

Rather, the media interworking units 204 or 306 of Christie create one port for the communication device 302 or 304, respectively, and one port for the ATM cross connect 316. The interworking units always convert a communication message to ATM format and send it to the ATM cross connect 316.

In light of the foregoing, Christie does not teach or suggest each and every limitation of claim 11. As such, claim 11 is allowable. In addition, claims 12-14 depend from claim 11 and are allowable over Christie for these and other reasons.

The Examiner rejected claims 1, 5-14 under 35 U.S.C. § 103(a) a being unpatentable over "Control and Management in Next-Generation Networks: Challenges and Opportunities," IEEE Communications Magazine, October 2000 (Modaressi) in view of U.S. Publication No. 2004/0190531 (Sibille).

Modaressi does not teach or suggest each and every limitation of claim 1. Rather, Modaressi discloses a network that includes the components of the traditional public switched telephone network (PSTN) interconnected by an IP/ATM network. Modaressi discloses this network in some detail and mentions the interconnection to the PSTN/IN briefly. Modaressi does not disclose how the communication is made between a device in the "new" IP/ATM and a device in the "old" PSTN/IN networks, much less interworking between two broadband heterogeneous networks.

Furthermore, Modaressi does not disclose "creating, within the media interworking equipment and based on a command from the call control equipment, a first internal media port that corresponds to the caller party equipment and a second internal media port that corresponds to the called party equipment and establishing a mapping between the first and second internal media ports" (emphasis added). Rather, Modarressi discloses residential

gateways that are connected to a device at one end and to the network at a second end. Modarressi also discloses a trunk gateway that is connected between the packet network and the PSTN network, but is not connected to any devices. *See Fig. 4.* Thus, Modarressi does not teach or suggest creating, within the media interworking equipment, a first internal media port that corresponds to a first party equipment and a second internal media port that corresponds to a second party equipment, much less the limitations of claim 1.

Sibille does not cure the deficiencies of Modarressi. Rather, Sibille discloses mapping a first protocol for an I-PSTN network to a second protocol for an E-PSTN network. Sibille discloses mapping between a first homogeneous network and a second homogeneous network. Thus, Sibille does not teach or suggest interworking between two broadband <u>heterogeneous</u> networks.

Furthermore discloses communicating over an IP network. A packet manager receives and sends packet communications between an ingress media gateway and an egress media gateway. The Examiner acknowledges that a "Vertical Interface Translation Function (VITF) in media gateway perform[s] mapping and translating." *See page 16 of the Office action dated 1/22/09.* The media gateways connect a network to a packet manager. Thus, Sibille does not teach or suggest creating, within the media interworking equipment, a <u>first internal media port corresponding to a caller party equipment</u> and a <u>second internal media port corresponding to a called party equipment</u> and establishing a mapping between the first and second internal media ports, much less the limitations of claim 1.

In light of the foregoing, Modarressi and Sibille, alone or in combination, do not teach or suggest each and every limitation of claim 1. As such, claim 1 is allowable. In addition, claims 3-10 depend from claim 1 and are allowable for these and other reasons.

Modarressi does not teach or suggest each and every limitation of claim 11. As discussed with respect to claim 1, Modarressi discloses a trunk gateway connected between a packet network and a PSTN/IN network. Modarressi only discusses the connection to the PSTN/IN briefly and does not disclose how the communication is made between a device in the IP/ATM and a device in the PSTN/IN networks, much less interworking between two broadband heterogeneous networks.

Furthermore, Modarressi discloses residential gateways that are connected to a device and to the network. Modarressi also discloses a trunk gateway that is connected between the packet network and the PSTN network, but is not connected to any devices. *See Fig. 4.* Thus, Modarressi does not teach or suggest creating, within the media interworking equipment, a <u>first</u>

internal media port that corresponds to a first party equipment and a second internal media port that corresponds to a second party equipment, much less the limitations of claim 1.

Sibille does not cure the deficiencies of Modarressi. As discussed, Sibille does not teach or suggest interworking between two broadband heterogeneous networks. Rather, Sibille discloses communicating between two homogeneous networks. Furthermore, Sibille does not teach or suggest creating, within the media interworking equipment, a first internal media port corresponding to a caller party equipment and a second internal media port corresponding to a called party equipment and establishing a mapping between the first and second internal medial ports. Rather, Sibille discloses mapping between a device in a homogeneous network and a packet manager.

In light of the foregoing, Modaressi and Sibille, alone or in combination, do not teach or suggest each and every limitation of claim 11. As such, claim 11 is allowable. In addition, claims 12-14 depend from claim 11 and are allowable for these and other reasons.

CONCLUSION

In light of the foregoing, Applicants respectfully submit that claims 1 and 3-14 are allowable. The undersigned is available for telephone consultation during normal business hours.

Respectfully submitted,

/derek c. stettner/

Derek C. Stettner
Reg. No. 37,945

File No. 026613-9002-00
Michael Best & Friedrich LLP
100 East Wisconsin Avenue
Milwaukee, Wisconsin 53202-4108
(414) 271-6560